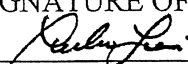
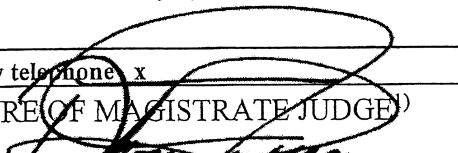


CRIMINAL COMPLAINT
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Kaily Beltran-Beltran ; DOB: 2004; United States Rosalinda Erives ; DOB: 2005; United States	DOCKET NO. MAGISTRATE'S CASE NO. 24-03710MJ
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about July 23, 2024, in the District of Arizona, Kaily Beltran-Beltran and Rosalinda Erives , named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, including Alberto Garcia-Villalpa, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On July 23, 2024, in the District of Arizona (Hereford), at approximately 8:05 a.m., a Border Patrol Agent (BPA) observed a 2016 Nissan Altima driving south on State Route 92 (SR92). This vehicle did not appear to be local traffic as it was not recognized by the BPA who patrolled this area. A record check on the Nissan Altima came back to an address in Phoenix, Arizona with a suspended registration. The BPA entered onto SR92 to determine the route of travel and follow the Nissan Altima. The BPA was unable to locate the vehicle and pulled off on a side street. The Nissan then drove past where the BPA was located, and the BPA was able to catch up and follow. The BPA observed a female driver, later identified as Kaily Beltran-Beltran , and female passenger, later identified as Rosalinda Erives . After making additional observations, the BPA activated his emergency equipment and performed a vehicle stop. As the BPA approached the Nissan, he noticed an occupant in the backseat. Before the BPA got to the Nissan, it sped off, and the BPA returned to his service vehicle. Due to the location, the BPA was unable to pursue this vehicle above the posted speed limit. Other BPAs responded and located the Nissan abandoned approximately 45 minutes later. Inside the Nissan, BPAs found empty water bottles, camouflage clothing, and backpacks, which are all consistent with human smuggling. After a search of the area, BPAs encountered three people, identified as Beltran , Erives and Alberto Garcia-Villalpa. Beltran admitted she was the driver of the Nissan and BPAs discovered the keys to the Nissan on her person. Garcia admitted to being illegally present in the United States without the proper documentation to enter, pass through, or remain here legally. Material witness Alberto Garcia-Villalpa stated he is a citizen of Mexico, and he paid a smuggling fee of 180,000 Mexican Pesos to be smuggled into the United States. Garcia stated that he entered the United States illegally on July 22, 2024, with four other people and two guides. He and two others entered the car, which already had a driver and one passenger. Garcia positively identified Beltran and Erives through a photo lineup. Garcia did not run after the car stopped but two others did.	
Continued on next page.	
MATERIAL WITNESS IN RELATION TO THE CHARGE: Alberto Garcia-Villalpa	
Detention Requested <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	SIGNATURE OF COMPLAINANT 
Sworn by telephone <input checked="" type="checkbox"/>	OFFICIAL TITLE Border Patrol Agent
SIGNATURE OF MAGISTRATE JUDGE 	DATE July 24, 2024

¹⁾ See Federal Rules of Criminal Procedure Rules 3, 4.1, and 5.1.

Continued from front page.

24-03710MJ

After waiving her *Miranda* rights, **Beltran** stated her friend put her in connection with a smuggler who can make her money. Beltran stated that she would make \$1,000 USD per person that was smuggled to Phoenix, Arizona. Beltran stated that she brought her roommate, **Erives**. Beltran said that she received information through the WhatsApp about when and where to pick up undocumented non-citizens. **Beltran** stated that she drove away from BPAs because she had an expired registration and no insurance.

After waiving her *Miranda* rights, **Erives** stated that they had picked up two undocumented non-citizens and dropped them off in Phoenix, Arizona and made \$2,000 USD. **Erives** said that it was an easy way to make money. They then drove back down to Sierra Vista to pick up more subjects. **Erives** stated that on the current transport event they originally picked up three people; two ran off and one stayed behind with her and **Beltran**. They were expecting to be paid \$1,000 per subject again.